

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP

ALBERT INNARELLI, ET AL,
DEFENDANTS

**MOTION OF DEFENDANT MICHAEL BERGDOLL
FOR ENLARGEMENT OF TIME**

The defendant Michael Bergdoll requests that the time for filing his motion concerning the method by which the alleged loss in this case should be calculated by the Court for sentencing purposes be enlarged up to and including July 28, 2006. In support of this motion the defendant says as follows:

1. Mr. Bergdoll's sentencing has been scheduled for September 25, 2006.
2. There are almost one (100) properties which are identified in the indictment in the case.

Researching the history of all of these all of these properties at the Registry of Deeds will require a substantial amount of time.

3. Counsel is attempting to coordinate and work with other defense counsel to present a consistent and agreed upon methodology for the court to follow in calculating the alleged loss in this case.

4. The additional time requested will permit counsel to achieve those goals and will preserve valuable judicial resources. Counsel is informed that similar motions have been filed by other defendants in this case and that the government has not objected to those motions.

Wherefore, the defendant Michael Bergdoll respectfully requests that this motion be allowed.

The Defendant
Michael Bergdoll
By his attorney

/s/ Steven W. Leary
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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by electronic filing of same, postage prepaid, to all attorneys of record.

5/25/06

/s/ Steven W. Leary
Steven W. Leary

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